



October 31, 2005

Bureau of Customs and Border Protection  
Office of Regulations and Rulings  
Regulations Branch  
1300 Pennsylvania Ave., NW  
Washington, D.C. 20229

Agencies: Department of Homeland Security  
Department of State

Docket: USCBP-2005-0005

To Whom It May Concern:

I am writing on behalf of the Arizona Office of Tourism and the statewide tourism industry to thank you for inviting public comment in response to the Advanced Notice of Proposed Rulemaking concerning the Western Hemisphere Travel Initiative (WHTI), and to express concern regarding its potential impact on travel and tourism.

We believe that we can promote international travel and trade and still incorporate new procedures that enhance U.S. homeland security. The Arizona Office of Tourism understands that the U.S. government has a legitimate need to increase security at ports of entry. However, there are several concerns that we believe will have adverse effects on a vital industry that deeply affects our state's economy.

While the Arizona Office of Tourism encourages travelers to secure passports if they do not already possess NEXUS or SENTRI cards, we feel that requiring all travelers to obtain passports will be placing a new burden on most of the travelers that would be affected by WHTI. Among the many negative effects are:

- *Cruise travel* - since the majority of cruise visitors departing the U.S. and traveling the Caribbean or to Alaska via a Canadian port do not currently carry U.S. passports
- *Student and youth travel* - most American students traveling into Canada, Mexico and other areas, and students entering the U.S. from Canada – most do not have passports
- *Cross-border bus tours* and casual travelers across the U.S. and Canadian borders. Border region retail and tourism stand to suffer if visitors are not in possession of proper proof of citizenship
- *Inbound Canadian travel* - less than half of all Canadians currently possess a passport, as they are currently not required to present a passport when entering the U.S. Americans are not required to show a passport when visiting Canada
- *The unique ability to attract tourist dollars based on proximity to Canada or Mexico*, including bi-national marketing campaigns such as Arizona and Sonora's "Two-Nation Vacation", cooperative promotional mapping with *National Geographic Traveler*, and long-stay winter visitors
- *The cost of obtaining a passport* may well be an issue, as the fee is currently \$97 for adults and \$82 for children under age 16 – imposing burdensome implications on family travel

The Arizona tourism community is also concerned that the current plan for a Two-Stage Implementation will be creating unnecessary hardships on travelers and our industry that could potentially lead to billions of dollars in lost visitor revenue. Reducing the government's administrative encumbrance by phasing the deadlines does not necessarily enhance our country's economic and foreign policy or homeland security interests, and this unfairly favors some countries or types of travel at the expense of others, with possibly critical economic, employment and diplomatic implications. In the interest of competitive fairness, and to provide sufficient time for the traveling public to prepare for the new rules, we instead support a single, uniform deadline of 12/31/07 for all WHTI countries and border crossings.

We petition for the Department of State and the Department of Homeland Security to cooperate on a feasibility study assessing the concept of a border crossing card that could be obtained by U.S. and Canadian citizens. Such a card could be less expensive and prove to be an effective alternative to a passport, while encouraging cross-border travelers to carry proof of citizenship in border communities without a NEXUS or SENTRI lane. We also recommend a thorough review of the cost of obtaining a passport.

We also strongly encourage collaboration between the U.S. Department of State and the U.S. Department of Homeland Security to build a fully comprehensive communication/information campaign, whatever the outcome of WHTI.

While the Arizona Office of Tourism supports the move toward the use of passports or similar secure documents that permit pre-registered travelers to cross the U.S. border with Canada or Mexico, we are disinclined to support any program that puts our unique cross-border relationships at risk. It is in our best interest to encourage travel and exchange with others, just as it is essential that we continue to embrace our prospective visitors. Cultural exchange may ultimately be our best defense, as well as a means of nurturing peace and our protection.

We appreciate the opportunity to express our endorsements of WHTI's proposed program, as well as our concerns regarding the detrimental impacts on our travel industry. We look forward to working with the Department of Homeland Security and the Department of State for a Western Hemisphere Travel Initiative that advances homeland, diplomatic, and economic security simultaneously.

I thank you in advance for entering this letter into the official comment record.

Regards,

A handwritten signature in black ink, reading "Margie A. Emmermann". The signature is written in a cursive, flowing style.

**Margie A. Emmermann**  
Director  
Arizona Office of Tourism